

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

DANIEL KANG,)	
)	
Plaintiff,)	
)	
vs.)	
)	
THE MAYOR AND ALDERMEN OF)	Civil Action No.: 4:21-cv-111-WTM-CLR
THE CITY OF SAVANNAH and ROY)	
W. MINTER, JR., Chief of Police for the)	
City of Savannah, Georgia,)	
)	
Defendants.)	
)	

CONSENT MOTION TO AMEND SCHEDULING ORDER

COME NOW the Plaintiff and Defendants (collectively the “Parties”) and hereby jointly move that the Court extend the deadlines in the current Scheduling Order (Doc. 66), respectfully showing the Court as follows:

1. The Parties are diligently pursuing discovery. Multiple rounds of written discovery have been exchanged, and more remains pending. Several depositions have been taken and more are scheduled for later in September and October. The Parties are also working to schedule additional depositions, but scheduling has been challenging given the number of witnesses, schedule of counsel, and because some witnesses reside out of the area. Defendants have also requested additional time to provide expert information.

2. The Parties have discussed current deadlines and agree that because of the remaining work to be done and the schedules of witnesses and counsel, the deadlines in the proposed amended scheduling order will enable the Parties to complete discovery efficiently and to effectively present issues for resolution to the Court.

3. This joint request is based upon good cause, is not interposed for purposes of delay, and will not prejudice any party.

4. The Parties respectfully request that for good cause shown, the Court enter the Amended Scheduling Order attached hereto as Exhibit "A."

Respectfully submitted this 20th day of September, 2022.

CONSENTED TO:

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Attorneys for Defendant The Mayor and Aldermen of the City of Savannah

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the within and foregoing **CONSENT MOTION TO AMEND SCHEDULING ORDER** by using the CM/ECF system which will send a notice of electronic filing to all parties.

Respectfully submitted this 20th day of September 2022.

s/Shawn A. Kachmar

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EXHIBIT A

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FOR THE SOUTHERN DISTRICT OF GEORGIA
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DANIEL KANG,

Plaintiff,

vs.

**THE MAYOR AND ALDERMEN OF
THE CITY OF SAVANNAH and ROY
W. MINTER, JR., Chief of Police for the
City of Savannah, Georgia,,**

Defendants.

Civil Action No.: 4:21-cv-111-WTM-CLR

AMENDED SCHEDULING ORDER

Pursuant to Federal Rule of Civil Procedure 16(b) and the Local Rules of this Court, after considering the Parties' Consent Motion to Amend Scheduling Order, the Court amends the Scheduling Order (Doc. 66) and imposes the following deadlines in the above-styled matter:

**LAST DAY TO FURNISH EXPERT WITNESS
REPORTS BY DEFENDANTS**

October 31, 2022

CLOSE OF DISCOVERY

December 2, 2022

JOINT STATUS REPORT DUE

January 9, 2023

**LAST DAY FOR FILING CIVIL MOTIONS
INCLUDING DAUBERT MOTIONS BUT EXCLUDING
MOTIONS *IN LIMINE***

January 27, 2023

Motions *in limine* shall be filed no later than five days prior to the pre-trial conference. All motions, other than summary judgment motions and motions to dismiss, shall be accompanied with a proposed order.

SO ORDERED, this ____ day of _____, 2022.

CHRISTOPHER L. RAY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF GEORGIA